

REMARKS

This Application has been carefully reviewed in light of the Office Action mailed March 26, 2004. Claims 1-28 were pending in the Application. In the Office Action, Claims 1-28 were rejected. In order to expedite and advance the prosecution of the present Application, Applicants amend Claims 1, 5, 12, 14-17, 19-20 and 25, and Applicants cancel Claim 4 without prejudice or disclaimer. Thus, Claims 1-3 and 5-28 remain pending in the Application.

In the Office Action, the following actions were taken or matters were raised:

SECTION 102 REJECTION

The Examiner rejected Claims 1-2, 4-6, 8-11 and 26-27 under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 6,160,544 issued to Hayashi et al. (hereinafter "*Hayashi*"). Applicants cancel Claim 4 without prejudice or disclaimer, thereby rendering the rejection of Claim 4 moot. Applicants respectfully traverse this rejection for at least the reasons discussed below for remaining Claims 1-2, 5-6, 8-11 and 26-27.

To anticipate a claim, each and every limitation must be found in a reference. In addition, "[t]he identical invention must be shown in as complete detail as is contained in the . . . claims" and "[t]he elements must be arranged as required by the claim." *Richardson v. Suzuki Motor Co.*, 9 USPQ 2d 1913, 1920 (Fed. Cir. 1989); *In re Bond*, 15 USPQ 2d 1566 (Fed. Cir. 1990); MPEP § 2131.

Applicants respectfully submit that *Hayashi* does not disclose or even suggest each and every limitation of amended independent Claim 1. For example, Applicants respectfully submit that *Hayashi* does not disclose or even suggest "a network chip coupled to the frame buffer" where the network chip comprises "a compression unit" and "a network interface" as recited by amended independent Claim 1. The Examiner refers to reference numerals 38 (transmitter terminal) and 50 (communication server) of *Hayashi* as disclosing a frame buffer (memory) and a network interface (68, 94) (Office Action, page 2). However, *Hayashi* states that figure 8 of *Hayashi* "shows an arrangement of the transmitter terminal 38, which comprises a PC main board 62 comprised of a CPU and a memory, an encoder (ENC) 66 as an expansion board, and a network interface card (NIC) 68, which are all interconnected by a

host bus 64 (*Hayashi*, column 9, lines 31-35). Further, *Hayashi* states that figure 10 of *Hayashi* “shows an arrangement of the communication server 50” which “comprises a PC main board 90 comprised of a CPU and a memory, a multiport card (MPC) 92 as an expansion board, and a network interface card (NIC) 94, which are all interconnected by a host bus 96 (*Hayashi*, column 10, lines 51-56). Thus, *Hayashi* apparently discloses a memory, an encoder and a network interface each disposed on a separate expansion board or card, in contrast to “a network chip coupled to the frame buffer” where the network chip comprises “a compression unit” and “a network interface” as recited by amended independent Claim 1. Therefore, for at least this reason, *Hayashi* does not anticipate amended independent Claim 1.

Claims 2, 5-6 and 8-11 that depend from independent Claim 1 are also not anticipated by *Hayashi* at least because they incorporate the limitations of Claim 1 and also they add additional elements that further distinguish *Hayashi*. Therefore, Applicants respectfully request that the rejection of Claims 2, 5-6 and 8-11 be withdrawn.

Applicants further submit that *Hayashi* does not disclose or even suggest each and every limitation of independent Claim 26. For example, Applicants respectfully submit that *Hayashi* does not disclose or even suggest “a network attachable graphics chip coupled to [a] frame buffer” where the network attachable graphics chip comprises “a graphics unit operable to render a graphics image,” “a compression unit” and “a network interface” as recited by independent Claim 26. With respect to independent Claim 26, the Examiner states that independent Claim 26 is similar in scope to independent Claim 1 (prior to amendment by this paper), and thus the rejections to independent Claim 1 are also applicable to independent Claim 26 (Office Action, page 4). Applicants respectfully disagree. Independent Claim 26 clearly recites elements not present in pre-amended independent claim 1, such as “a network attachable graphics chip” having “a graphics unit operable to render a graphics image” and “a compression unit.” However, in both the present Office Action and the Office Action mailed October 9, 2003, the Examiner fails to address these limitations. Therefore, not only has the Examiner failed to establish a *prima facie* case of anticipation with respect to independent Claim 26, but Applicants are also unable to adequately respond or address the Examiner’s rejection of independent Claim 26 based on a lack of grounds or basis of such rejection

provided by the Examiner. Thus, Applicants respectfully request that the rejection of independent Claim 26 be withdrawn.

Claim 27 that depends from independent Claim 26 is also not anticipated by *Hayashi* for at least the reasons discussed above, and additionally at least because Claim 27 incorporates the limitations of Claim 26 and also it adds additional elements that further distinguish *Hayashi*. Therefore, Applicants respectfully request that the rejection of Claim 27 be withdrawn.

SECTION 103 REJECTION

The Examiner rejected Claims 3, 7 and 28 under 35 U.S.C. § 103(a) as being unpatentable over *Hayashi*. The Examiner also rejected Claims 12-25 under 35 U.S.C. § 103(a) as being unpatentable over *Hayashi* in view of U.S. Patent No. 6,304,895 issued to Schneider et al. (“*Schneider*”). Applicants respectfully traverse these rejections for at least the reasons discussed below.

Claims 3 and 7 depend from independent Claim 1, and Claim 28 depends from independent Claim 26. For at least the reasons discussed above, independent Claims 1 and 26 are allowable over the cited reference. Therefore, Claims 3, 7 and 28 are also allowable, and Applicants respectfully request that the rejection of Claims 3, 7 and 28 be withdrawn.

Of Claims 12-25, Claims 12 and 19 are independent. Applicant respectfully submits that the proposed combination of *Hayashi* and *Schneider* does not disclose, teach or suggest all the elements of amended Claims 12 and 19, nor is there any motivation or suggestion to combine reference teachings as proposed by the Examiner to arrive at Applicants’ invention as recited by amended Claims 12 and 19. Further, the proposed combination of references teach away from the invention as recited by amended claims 12 and 19.

Applicants respectfully submit that neither *Hayashi* nor *Schneider*, alone or in combination, discloses the limitations of amended Claim 12. For example, independent Claim 12, as amended, recites “logically dividing a frame buffer of a graphics adapter into a plurality of segments, at least one segment of said plurality of segments storing graphics

image data corresponding to a particular destination device of a plurality of destination devices.” The Examiner admits that *Hayashi* does not disclose logically dividing a frame buffer into a plurality of segments (Office Action, page 6). The Examiner then states that such limitation is shown in the teaching of *Schneider*, and that it would have been obvious to incorporate the teaching of *Schneider* into the teaching of *Hayashi* (Office Action, page 6). Without addressing the accuracy of the Examiner’s assertion of the teaching of *Schneider*, even if the *Schneider* reference is combined with the *Hayashi* reference as proposed by the Examiner, the combination of which Applicants submit is improper, the resulting combination still does not disclose teach or suggest “logically dividing a frame buffer of a graphics adapter into a plurality of segments” where “at least one segment . . . stor[es] graphics image data corresponding to a particular destination device” as recited by amended Claim 12. Therefore, for at least this reason, amended independent Claim 12 is patentable over the cited combination of references.

Further, there is no motivation or suggestion to combine reference teachings to arrive at Applicants’ invention as recited by amended Claim 12. For example, *Hayashi* is directed toward a multicast communication broadcast (*Hayashi*, column 4, lines 39-67). Thus, there is no motivation or suggestion to modify *Hayashi* to “logically divid[e] a frame buffer of a graphics adapter into a plurality of segments” where “at least one segment . . . stor[es] graphics image data corresponding to a particular destination device” as recited by amended Claim 12 (emphasis added) because *Hayashi* is directed toward a multicast communication broadcast where communication packets are distributed to all nodes. Actually, the proposed combination of references teaches away from amended Claim 12 because *Hayashi*, being directed toward a multicast communication broadcast, does not discern between different destination devices of the broadcast since the broadcast is distributed to all nodes. Therefore, for at least these reasons also, amended Claim 12 is patentable over the cited references.

Applicants respectfully submit that neither *Hayashi* nor *Schneider*, alone or in combination, discloses the limitations of amended Claim 19. For example, independent Claim 19, as amended, recites “comparing graphics image data of a new image for a particular destination device of a plurality of destination devices with graphics image data of a previous image for said particular destination device stored in a frame buffer of a graphics adapter remote from said particular destination device.” The Examiner admits that *Hayashi*

does not disclose comparing graphics image data of a new image for a destination device with image graphics data of a previous image for the destination device (Office Action, page 7). The Examiner then states that such limitation is shown in the teaching of *Schneider*, and that it would have been obvious to incorporate the teaching of *Schneider* into the teaching of *Hayashi* (Office Action, page 7). Without addressing the accuracy of the Examiner's assertion of the teaching of *Schneider*, even if the *Schneider* reference is combined with the *Hayashi* reference as proposed by the Examiner, the combination of which Applicants submit is improper, the resulting combination still does not disclose teach or suggest "comparing graphics image data of a new image for a particular destination device of a plurality of destination devices with graphics image data of a previous image for said particular destination device stored in a frame buffer of a graphics adapter remote from said particular destination device" as recited by amended Claim 19 (emphasis added). Therefore, for at least this reason, amended independent Claim 19 is patentable over the cited combination of references.

Further, there is no motivation or suggestion to combine reference teachings as proposed by the Examiner to arrive at Applicants' invention as recited by amended Claim 19. For example, as discussed above, *Hayashi* is directed to a multicast communication broadcast. Therefore, there is no suggestion or motivation to modify *Hayashi* to "compar[e] graphics image data of a new image for a particular destination device . . . with graphics image data of a previous image for said particular destination device" as recited by amended Claim 19 (emphasis added) because the content of *Hayashi* is distributed to all nodes. Actually, the proposed combination of references teaches away from amended Claim 19 because *Hayashi*, being directed toward a multicast communication broadcast, does not discern between different destination devices of the broadcast since the broadcast is distributed to all nodes. Therefore, for at least these reasons also, amended Claim 19 is patentable over the cited references.

Claims 13-18 depend from independent Claim 12, and Claims 20-25 depend from independent Claim 19. For at least the reasons discussed above, independent Claims 12 and 19 are patentable over the cited references. Therefore, Claims 13-18 and 20-25 that depend respectively from independent Claims 12 and 19 are also patentable. Therefore, Applicants respectfully request that the rejection of Claims 13-18 and 20-25 be withdrawn.

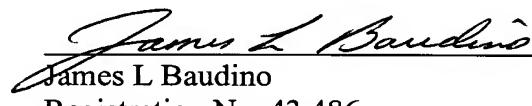
CONCLUSION

Applicants have made an earnest attempt to place this case in condition for immediate allowance. For the foregoing reasons and for other reasons clearly apparent, Applicants respectfully request reconsideration and full allowance of all pending claims.

No fee is believed due with this response. However, if Applicants have overlooked the need for any fee with this response, the Commissioner is hereby authorized to charge any fees or credit any overpayment associated with this response to Deposit Account No. 08-2025 of Hewlett-Packard.

Respectfully submitted,

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